

Lois H. Chang, State Bar No. 278146  
NEYHART, ANDERSON, FLYNN & GROSBOLL  
369 Pine Street, Suite 800  
San Francisco, CA 94104  
Tel. (415) 677-9440  
Fax (415) 677-9445  
Email: Lchang@neyhartlaw.com  
**Attorneys for Plaintiffs**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
(San Jose Division)

TRUSTEES OF THE HOD CARRIERS LOCAL 166  
SOUTH BAY PENSION FUND, MONEY PENSION  
PLAN, VACATION FUND, UNION DUES,  
TRAINING FUND, AND PROMOTION FUND; AND  
HOD CARRIERS LOCAL 166 WEST BAY  
CONSOLIDATED PENSION FUND, VACATION  
FUND, UNION DUES, TRAINING FUND, AND  
PROMOTION FUND; AND HOD CARRIERS  
LOCAL UNION NO.166

Plaintiffs,

v.

LA PAZ STUCCO & PLASTERING, INC., a  
California corporation;

Defendant.

Case No. 12-cv-00922 EJD (HRL)

**NOTICE OF SUBSTITUTION  
OF COUNSEL; ~~REVOKE~~  
ORDER**

NEYHART,  
ANDERSON,  
FLYNN &  
GROSBOLL  
ATTORNEYS AT LAW

NOTICE OF SUBSTITUTION OF COUNSEL  
Case No. 12-cv-00922 EJD (HRL)

1           **TO THE ABOVE-ENTITLED COURT AND ALL PARTIES AND THEIR**  
2           **ATTORNEYS OF RECORD:**

3           PLEASE TAKE NOTICE that Plaintiffs BOARD OF TRUSTEES OF THE HOD  
4           CARRIERS LOCAL 166 SOUTH BAY PENSION FUND, MONEY PENSION PLAN,  
5           VACATION FUND, UNION DUES, TRAINING FUND, AND PROMOTION FUND; and  
6           BOARD OF TRUSTEES OF THE HOD CARRIERS LOCAL 166 WEST BAY  
7           CONSOLIDATED PENSION FUND, VACATION FUND, UNION DUES, TRAINING FUND,  
8           AND PROMOTION FUND; and HOD CARRIERS LOCAL UNION NO. 166 (hereafter referred  
9           to collectively as "Plaintiffs") hereby file this notice of substitution of counsel. Plaintiffs hereby  
10          substitute Lois H. Chang and her firm, Neyhart, Anderson, Flynn & Grosboll, APC, in place of  
11          and instead of Sue Campbell, as counsel and attorneys of record in this matter.  
12

13  
14          Plaintiffs' new counsel in this matter and new attorneys of record to whom all notices and  
15          papers should be served is:

16                               Lois H. Chang, Esq. (SBN 278146)  
17                               NEYHART, ANDERSON, FLYNN & GROSBOLL, APC  
18                               369 Pine Street, Suite 800  
19                               San Francisco, CA 94104  
20                               Telephone: (415) 677-9440  
21                               Facsimile: (415) 677-9445  
22                               Email: [Lchang@neyhartlaw.com](mailto:Lchang@neyhartlaw.com)

23  
24  
25  
26       NEYHART,  
27       ANDERSON,  
28       FLYNN &  
      GROSBOLL  
      ATTORNEYS AT LAW

NOTICE OF SUBSTITUTION OF COUNSEL  
Case No. 12-cv-00922 EJD (HRL)

1 As new counsel of record, the undersigned hereby accepts this substitution:

2 NEYHART, ANDERSON, FLYNN & GROSBOLL, APC

3 By: Lois H. Chang  
4 Lois H. Chang, Esq.

Dated: April 9, 2014

5 The undersigned hereby agrees to the substitution of Lois H. Chang as new counsel of record:

6 LAW OFFICE OF SUE CAMPBELL

7 By: Sue Campbell  
8 Sue Campbell, Esq.

Dated: April 7, 2014

9 BOARD OF TRUSTEES OF THE HOD CARRIERS LOCAL 166 SOUTH BAY PENSION  
10 FUND, MONEY PENSION PLAN, VACATION FUND, UNION DUES, TRAINING FUND,  
11 AND PROMOTION FUND; BOARD OF TRUSTEES OF THE HOD CARRIERS LOCAL 166  
12 WEST BAY CONSOLIDATED PENSION FUND, VACATION FUND, UNION DUES,  
13 TRAINING FUND, AND PROMOTION FUND; and HOD CARRIERS LOCAL UNION NO.  
14 166

13 By: Samuel Robinson  
14 Samuel Robinson

Dated: May 6, 2014

15 Business Manager of Hod Carriers Local Union No. 166,  
16 AFL-CIO, Trustee of Plaintiff Trust Funds, and Authorized Agent of Plaintiffs

17 ~~PROPOSED~~ ORDER

18 The substitution of Lois H. Chang of Neyhart, Anderson, Flynn & Grosboll, APC as new counsel  
19 of record in this action is so ordered.

20 Dated: 7/14/2014

21 Edward J. Davila

22 Edward J. Davila

23 UNITED STATES DISTRICT COURT JUDGE

24  
25  
26 NEYHART,  
27 ANDERSON,  
28 FLYNN &  
GROSBOLL  
ATTORNEYS AT LAW

NOTICE OF SUBSTITUTION OF COUNSEL  
Case No. 12-cv-00922 EJD (HRL)

PROOF OF SERVICE BY MAIL

I, Judy Dunworth, declare:

I am employed in the City and County of San Francisco in the State of California. I am over the age of eighteen years and not a party to the present action. My business address is Neyhart, Anderson, Flynn & Grosboll, APC, located at 369 Pine Street, Suite 800 in San Francisco, CA 94104. On July 14, 2014, I served the within:


**NOTICE OF SUBSTITUTION OF COUNSEL; [PROPOSED] ORDER**

on the parties in said cause following our business practice, with which I am readily familiar. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid. I placed a true copy of the within document enclosed in a sealed envelope with first class postage thereon fully prepaid for collection and deposit on the date shown below in the United States mail at San Francisco, California addressed as follows:

**La Paz Stucco & Plastering, Inc.  
26 Ellert Street  
San Francisco, CA 94110**

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATE: July 14, 2014



JUDY DUNWORTH

NEYHART,  
ANDERSON,  
FLYNN &  
GROSBOLL  
ATTORNEYS AT LAW

NOTICE OF SUBSTITUTION OF COUNSEL  
Case No. 12-cv-00922 EJD (HRL)